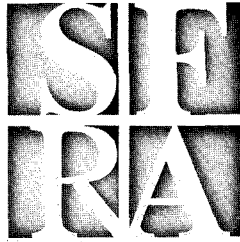


**San Francisco
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December 29, 1997

Commanding Officer
Engineering Field Activity, West
Naval Facilities Engineering
Attn: Richard Powell, Code 6221
900 Commodore Drive
San Bruno, CA 94066

Dear Mr. Powell:

On behalf of the San Francisco Redevelopment Agency (SFRA), we are providing comment on the Hunters Point Shipyard Parcel E Draft Final Remedial Investigation Report. These comments include staff input from SFRA, as well as from the Department of Public Works and the Public Utilities Commission.

1. The San Francisco Redevelopment Plan (7/97) designates locations in Parcel E for future wetland construction. Has the Navy characterized the nature and extent of contamination in Parcel E to evaluate the level of remedial action necessary to sustain a viable wetland?
2. Wetlands have been utilized as a remedial tool for groundwater and soil cleanup. Does this RI provide the level of information necessary for the Navy to evaluate wetlands as a viable remediation tool to be considered during the Feasibility Study?
3. There may be many areas in Parcel E where activities associated with development and infrastructure improvements and repairs will encounter contaminated materials that were not identified through the RI process. What are the Navy's plans for handling (storage, transport, and disposal) contaminated materials which are identified during infrastructure improvements and redevelopment activities?

Hazardous and contaminated materials which are discovered during repair and improvement activities will place an undue fiscal burden on future development projects, and present future environmental liability issues.

4. The RI identifies Parcel E IR-1/21 as having been used as an industrial landfill. The HPS boundary in this area appears to cut an inconclusive, if not an arbitrary line across the northwest corner of the landfill in Parcel E. Has the Navy performed investigative sampling to determine to what extent the IR-1/21 landfill extends beyond the current HPS boundary? Does the Navy plan on performing additional characterization beyond the current HPS boundary adjacent to IR-1/21?

5. Page 4-1059, Storm Drain System

- a) What is the status of the 3 storm drain system discharge points to the bay at Parcel E, are they actively discharging? Are they permitted? Are the discharges in compliance? How often are the outfalls sampled?
- b) Are there any known dry wells in Parcel E, if so where are they located, what type of flow do they receive, how are they constructed, and have the dry well construction materials been sampled?

6. Page 4-1264, Section 4.17.1.2 RI Field Investigations

- a) The RI describes Drainage A as including 25,000 feet of drainage area, predominantly in Parcel E. How many linear feet of storm sewer is in Parcel E? How many linear feet of the storm sewer was video taped prior to any removal action? How many linear feet of storm sewer was video taped after the removal action?
- b) The RI Field Activities Summary table on page 4-1064 indicates that just three storm drain sediment samples were collected for all of Parcel E storm sewers during the RI. Are three sample a sufficient number to gain a representative understanding of the storm drain sediment? On page 4-1075, the RI states that storm drain sediment removal was completed in early 1997, were any confirmation samples collected after the cleaning? If so, how many and what were the results?

7. Page 4-1075, Section 4.17.5.1 Potential Migration Routes

- a) Has all the storm drain pipe in IR-50 been cleaned? How does the Navy plan to clean drain pipe that is below the groundwater table?
- b) In the Navy's judgment, has the storm drain system in IR-50 of Parcel E been cleaned, including verification sampling, such that in the future when City crews perform maintenance and repairs on the system, the likelihood of encountering residual hazardous and contaminated materials will be eliminated? If found, how will residual hazardous and contaminated materials be handled?

8. Page 4-1079, Section 4.17.7.1 Site Characteristics and Potential Sources

- a) The RI states that the storm drain lines leading toward IR-1/21 from Crisp Avenue are to be cleaned and permanently plugged. Has this work been initiated, and when is this work expected to be completed?
- b) It seems possible that if a cracked storm sewer line is surrounded by contaminated soil, then groundwater originating as rain or surface water, moving vertically through the contaminated soil, could transport contaminants into the storm sewer line and eventually discharge into the bay. Has the Navy evaluated whether the cracks in the storm sewer lines allow contaminated groundwater and sediment to flow into the sewer line?

9. Page 4-1084, Section 4.18.1.2 RI Field Investigations

- a) It appears that only one Sanitary Sewer System Water Sample was collected in order to evaluate whether the entire Parcel E sanitary sewer was leaking to groundwater or whether groundwater was infiltrating the sanitary sewer. This does not appear to be an adequate sampling investigation. Please explain how one sample can be used to characterize the entire Parcel E sanitary sewer flow?
- b) Have the sanitary sewers been video taped in the last year?
- c) Page 4-1083, Section Previous Investigations, Technical Study, the RI states that a 1987 study concluded that the facility wide [including Parcel E]sanitary sewer system was in poor condition marked by corroded piping and manhole walls, leaking and broken joints and piping, and improperly disconnected flow diversion structures. On page 4-1098, Section Conclusions, Site Characteristics and Potential Sources, the RI states that the current physical condition of the sewer system in Parcel E is good based on observations performed during the Site Investigation. Please explain this disparity between the findings of these two investigations of the Parcel E sanitary sewer?

10. Storage Tanks

Are all the Parcel E underground storage tanks (USTs) and above ground storage tanks (ASTs) in regulatory compliance with Federal, State, and local regulations? It appears that the USTs are, but the RI is unclear about the compliance status of the ASTs. By December 1998 all USTs are to meet current state and federal regulations.

11. Groundwater

Has the Navy sufficiently characterized groundwater to enable groundwater remediation design planning? If groundwater remediation will not be done because there is no current health risk or present beneficial use of groundwater, this may only be true for the current base use situation.

Thank you for the opportunity to make comments. If you have any questions please contact John Chester at 554-8378 or Steve Mullinnix at 554-8374.

Sincerely,



Steve Mullinnix
Division Manager
SF Department of Public Works
Bureau of Construction Management
Site Assessment and Remediation

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